

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LI LAN LI and LYDIA LEUNG as
representatives of all people similarly
situated,

SUMMONS IN A CIVIL ACTION

08 CV 3067

V.

CASE NUMBER:

CABLE NEWS NETWORK a/k/a CNN,
TURNER BROADCASTING SYSTEM,
INC. and JACK CAFFERTY.

JUDGE CHIN

TO: (Name and Address of Defendant)
CABLE NEWS NETWORK a/k/a CNN,
TURNER BROADCASTING SYSTEM,
INC. and JACK CAFFERTY.

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S
ATTORNEY (name and address)

Law Office of Ming Hai, P.C.
36-09 Main Street, Suite 7B
Flushing, New York 11354
(718)-455-9111

an answer to the complaint which is served on you with this summons, within
30 days after service of this summons on you, exclusive of the day of
service. If you fail to do so, judgment by default will be taken against you for the relief
demanded in the complaint. Any answer that you serve on the parties to this action must
be filed with the Clerk of this Court within a reasonable period of time after service.

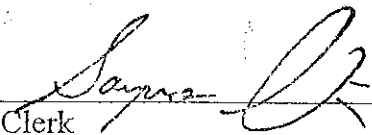
J. MICHAEL McMAHON

APR 24 2008

Clerk

Date

Deputy Clerk



AO 440 (Rev. 8/01) Summons in a Civil Action

RETURN OF SERVICE

Service of the Summons and complaint was made by me ⁽¹⁾	DATE
NAME OF SERVER (PRINT)	TITLE

Check one box below to indicate appropriate method of service

☐ Served personally upon the defendant. Place where served:

☐ Left with the defendant or with a person of suitable age and discretion then residing therein.

Name of person with whom the summons and complaint were left:

☐ Returned unexecuted:

☐ Other (specify):
STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL
		\$0.00

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

Signature of Server

Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

(SEE REVERSE)

(PLACE AN x IN ONE BOX ONLY)

ORIGIN

- ☒ 1 Original Proceeding ☐ 2a. Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from (Specify District) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judge Judgment

AND at least one party is a pro se filigant

(PLACE AN x IN ONE BOX ONLY)

BASIS OF JURISDICTION

- ☐ 1 U.S. PLAINTIFF ☐ 2 U.S. DEFENDANT ☐ 3 FEDERAL QUESTION (U.S. NOT A PARTY) ☒ 4 DIVERSITY

IF DIVERSITY, INDICATE
CITIZENSHIP BELOW.
(28 USC 1332, 1441)

CITIZENSHIP OF PRINCIPAL PARTIES (FOR DIVERSITY CASES ONLY)

(Place an [X] in one box for Plaintiff and one box for Defendant)

CITIZEN OF THIS STATE	PTF DEF <input checked="" type="checkbox"/> <input type="checkbox"/>	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY	PTF DEF <input checked="" type="checkbox"/> <input type="checkbox"/>	INCORPORATED and PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE	PTF DEF <input type="checkbox"/> <input type="checkbox"/>
CITIZEN OF ANOTHER STATE	<input type="checkbox"/> <input checked="" type="checkbox"/>	INCORPORATED or PRINCIPAL PLACE OF BUSINESS IN THIS STATE	<input type="checkbox"/> <input type="checkbox"/>	FOREIGN NATION	<input type="checkbox"/> <input type="checkbox"/>

PLAINTIFF(S) ADDRESS(ES) AND COUNTY(IES)

LILAN LI, @ XIZHIMEN NANDA STREET, BEIJING, CHINA

LYDIA LEUNG, 126 Lafayette Street, #2F, New York, NY 10013

DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES)

1 TIME WARNER CENTER, NEW YORK, NEW YORK

DEFENDANT(S) ADDRESS UNKNOWN

REPRESENTATION IS HEREBY MADE THAT, AT THIS TIME, I HAVE BEEN UNABLE, WITH REASONABLE DILIGENCE, TO ASCERTAIN THE RESIDENCE ADDRESSES OF THE FOLLOWING DEFENDANTS:

Check one: THIS ACTION SHOULD BE ASSIGNED TO: ☐ WHITE PLAINS ☐ FOLEY SQUARE
(DO NOT check either box if this a PRISONER PETITION.)

DATE SIGNATURE OF ATTORNEY OF RECORD

APRIL 17, 2008

RECEIPT #

ADMITTED TO PRACTICE IN THIS DISTRICT

☐ NO
☒ YES (DATE ADMITTED Mo. _____ Yr. _____)

Attorney Bar Code # MH 8849

Magistrate Judge is to be designated by the Clerk of the Court.

Magistrate Judge _____ is so Designated.

J Michael McMahon, Clerk of Court by _____ Deputy Clerk, DATED _____

UNITED STATES DISTRICT COURT (NEW YORK SOUTHERN)

JS 44C/SDNY
REV. 12/2005

CIVIL COVER SHEET

08 CV 3867

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for use of the Clerk of Court for the purpose of initializing the civil docket sheet.

PLAINTIFFS

Lilan Li, Lydia Leung as representatives of all people
similarly situated

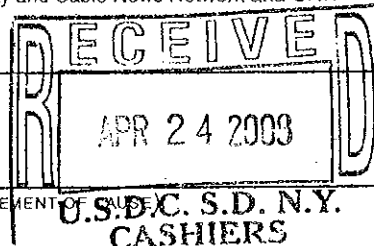
DEFENDANTS

Jack Cafferty and Cable News Network aka CNN

ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Law Office of Ming Hai, PC
36-09 Main St. #7B, Flushing NY 11354 (718) 445 9111

ATTORNEYS (IF KNOWN)



CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF FACTS)

Defamation;
Intentional/Reckless Infliction of Emotional DistressesHas this or a similar case been previously filed in SDNY at any time? No ☒ Yes? ☐ Judge Previously AssignedIf yes, was this case Vol ☐ Invol ☐ Dismissed. No ☐ Yes ☐ If yes, give date _____ & Case No. _____

(PLACE AN [x] IN ONE BOX ONLY)

NATURE OF SUIT

ACTIONS UNDER STATUTES

CONTRACT		TORTS		FORFEITURE/PENALTY		BANKRUPTCY		OTHER STATUTES	
[] 110 INSURANCE	[] 310 AIRPLANE	[] 362 PERSONAL INJURY - MED MALPRACTICE	[] 610 AGRICULTURE	[] 422 APPEAL	[] 400 STATE				
[] 120 MARINE	[] 315 AIRPLANE PRODUCT LIABILITY	[] 365 PERSONAL INJURY PRODUCT LIABILITY	[] 620 FOOD & DRUG	28 USC 158	REAPPORTIONMENT				
[] 130 MILLER ACT	[] 320 ASSAULT, LIBEL & SLANDER	[] 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY	[] 625 DRUG RELATED SEIZURE OF PROPERTY	[] 423 WITHDRAWAL	ANTITRUST				
[] 140 NEGOTIABLE INSTRUMENT	[] 330 FEDERAL EMPLOYERS' LIABILITY		21 USC 881	28 USC 157	[] 430 BANKS & BANKING				
[] 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT	[] 340 MARINE		[] 630 LIQUOR LAWS		[] 450 COMMERCE/ICC RATES/ETC				
[] 151 MEDICARE ACT	[] 345 MARINE PRODUCT LIABILITY		[] 640 RR & TRUCK		[] 460 DEPORTATION				
[] 152 RECOVERY OF DEFAULTED STUDENT LOANS (EXCL VETERANS)	[] 350 MOTOR VEHICLE	[] 370 OTHER FRAUD	[] 650 AIRLINE REGS		[] 470 RACKETEER INFLUENCED & CORRUPT ORGANIZATION ACT (RICO)				
[] 153 RECOVERY OF OVERPAYMENT OF VETERANS BENEFITS	[] 355 MOTOR VEHICLE PRODUCT LIABILITY	[] 371 TRUTH IN LENDING	[] 660 OCCUPATIONAL SAFETY/HEALTH		[] 480 CONSUMER CREDIT				
[] 160 STOCKHOLDERS SUITS	[] 360 OTHER PERSONAL INJURY	[] 380 OTHER PERSONAL PROPERTY DAMAGE PRODUCT LIABILITY	[] 690 OTHER		[] 490 CABLE/SATELLITE TV				
[] 190 OTHER CONTRACT					[] 810 SELECTIVE SERVICE				
[] 195 CONTRACT PRODUCT LIABILITY					[] 850 SECURITIES/COMMODITIES/EXCHANGE				
[] 196 FRANCHISE					[] 875 CUSTOMER CHALLENGE				
					12 USC 3410				
					[] 891 AGRICULTURE ACTS				
					[] 892 ECONOMIC STABILIZATION ACT				
					[] 893 ENVIRONMENTAL MATTERS				
					[] 894 ENERGY ALLOCATION ACT				
					[] 895 FREEDOM OF INFORMATION ACT				
					[] 900 APPEAL OF FEE DETERMINATION UNDER EQUAL ACCESS TO JUSTICE				
					[] 950 CONSTITUTIONALITY OF STATE STATUTES				
					[] 890 OTHER STATUTORY ACTIONS				

Check if demanded in complaint:

X CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DO YOU CLAIM THIS CASE IS RELATED TO A CIVIL CASE NOW PENDING IN S.D.N.Y.? IF SO, STATE:

DEMAND \$ 1.3 billion OTHER

JUDGE

DOCKET NUMBER

Check YES only if demanded in complaint

JURY DEMAND: X YES ☐ NO

NOTE: Please submit at the time of filing an explanation of why cases are deemed related.

(SEE REVERSE)

(PLACE AN 'x' IN ONE BOX ONLY)

ORIGIN

- ☒ 1 Original Proceeding
- ☐ 2a. Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from (Specify District)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judge Judgment
- ☐ 2b. Removed from State Court
- AND at least one party is a pro se litigant

(PLACE AN 'x' IN ONE BOX ONLY)

BASIS OF JURISDICTION

- ☐ 1 U.S. PLAINTIFF
- ☐ 2 U.S. DEFENDANT
- ☐ 3 FEDERAL QUESTION (U.S. NOT A PARTY)
- ☒ 4 DIVERSITY

IF DIVERSITY, INDICATE
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CITIZEN OF THIS STATE	PTF <input checked="" type="checkbox"/> 1 DEF <input checked="" type="checkbox"/> 1	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY	PTF <input type="checkbox"/> 3 DEF <input checked="" type="checkbox"/> 3	INCORPORATED and PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE	PTF <input type="checkbox"/> 5 DEF <input type="checkbox"/> 5
CITIZEN OF ANOTHER STATE	<input checked="" type="checkbox"/> 2 <input checked="" type="checkbox"/> 2	INCORPORATED or PRINCIPAL PLACE OF BUSINESS IN THIS STATE	<input type="checkbox"/> 4 <input type="checkbox"/> 4	FOREIGN NATION	<input type="checkbox"/> 6 <input type="checkbox"/> 6

PLAINTIFF(S) ADDRESS(ES) AND COUNTY(IES)

Lilan Li, at Xizhimen Nanda Street, Beijing, China

Lydia Leung, at 126 Lafayette St., #2F, New York NY 10013

DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES)

1 Time Warner Center, New York, New York

DEFENDANT(S) ADDRESS UNKNOWN

REPRESENTATION IS HEREBY MADE THAT, AT THIS TIME, I HAVE BEEN UNABLE, WITH REASONABLE DILIGENCE, TO ASCERTAIN THE RESIDENCE ADDRESSES OF THE FOLLOWING DEFENDANTS:

Check one: THIS ACTION SHOULD BE ASSIGNED TO:
(DO NOT check either box if this a PRISONER PETITION.)

☐ WHITE PLAINS☒ FOLEY SQUARE

DATE

April 17, 2008

SIGNATURE OF ATTORNEY OF RECORD



ADMITTED TO PRACTICE IN THIS DISTRICT

☐ NO☒ YES (DATE ADMITTED Mo. _____ Yr. _____)

RECEIPT #

Attorney Bar Code # MH 8849

Magistrate Judge is to be designated by the Clerk of the Court.

Magistrate Judge _____ is so Designated.

J Michael McMahon, Clerk of Court by _____ Deputy Clerk, DATED _____

UNITED STATES DISTRICT COURT (NEW YORK SOUTHERN)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LI LAN LI and LYDIA LEUNG as
representatives of all people similarly
situated,

Index No.

Plaintiff,

- against -

COMPLAINT

CABLE NEWS NETWORK a/k/a CNN, TURNER
BROADCASTING SYSTEM, INC. and JACK CAFFERTY.
Defendants.
----- X

Plaintiffs, LI LAN LI and LYDIA LEUNG, by its attorneys LAW OFFICE OF
MING HAI, P.C., complaining of the Defendants, alleges upon information and belief as
follows:

THE PARTIES

1. Plaintiff LI LAN LI is a citizen and resident of Beijing, China.
2. Plaintiff LYDIA LEUNG is a citizen and resident of New York with an
address at 126 Lafayette Street, #2F, New York, New York 10013.
3. Based on information and belief, Defendant CABLE NEWS NETWORK
a/k/a CNN, is located in Atlanta, Georgia. Upon information and belief, at all times
hereinafter mentioned, Defendant CABLE NEWS NETWORK a/k/a CNN (hereinafter
“CNN”) is a foreign corporation registered in the State of Delaware, and is “authorized”

to do business in New York under New York State Business Corporation Law Section 1301 (a), 1304, 1306, thus subject to the general jurisdiction of this State.

4. Defendant CNN has engaged in business activities in the State of New York systematically, continuously and demonstrated a fair measure of permanence, with business locations and operations in following addresses of this State: 1 Time Warner Center, Manhattan, New York. Defendant is thus subject to the general jurisdiction of this State under New York State CPLR 301 and Federal Law.

5. Defendant CNN is authorized to do business in the State New York, has engaged in business activities systematically and consistently in the State of new York, with its place of business at 1 Time Warner Center, Manhattan, New York.

6. Defendant TURNER BROADCASTING SYSTEM, INC. is a corporation duly registered in the State of Georgia. Upon information and belief, at all times hereinafter mentioned, Defendant TURNER BROADCASTING SYSTEM, INC. (hereinafter "TURNER") has engaged in business activities in the State of New York systematically, continuously and demonstrated a fair measure of permanence, with business locations and operations in following addresses of this State: 1 Time Warner Center, Manhattan, New York. Defendant is thus subject to the general jurisdiction of this State under New York State CPLR 301 and Federal Law.

7. Defendant "TURNER" is authorized to do business in the State New York, has engaged in business activities systematically and consistently in the State of new York, with its place of business at 1 Time Warner Center, Manhattan, New York. Defendant "TURNER" has consented to the Jurisdiction of the State of New York, with a

designated Registered Agent for process service purpose as follows: C T Corporation System, 111 Eighty Ave., New York NY 10011.

8. Upon information and belief, TURNER owns CNN.

9. Defendant JACK CAFFERTY is an employee, agent, representative, officer of co-defendant TURNER and CNN. Upon information and belief, at all time hereinafter mentioned, Defendant JACK CAFFERTY (hereinafter "JACK"), through his employment with co-defendants, and individually, has engaged in business activities in the State of New York systematically, continuously and demonstrated a fair measure of permanence, with business locations and operations in following addresses of this State: 1 Time Warner Center, Manhattan, New York. Defendant is thus subject to the general jurisdiction of this State under New York State CPLR 301 and Federal Law.

10. Defendant JACK CAFFERTY, through his employment with co-defendants, is authorized to do business in the State New York, has engaged in business activities systematically and consistently in the State of new York, with its place of business at 1 Time Warner Center, Manhattan, New York. The amount in controversy exceeds \$75,000.00 as the underlying complaint seeks \$1,300,000,000.00 in damages for defamation and emotional distress.

JURISDICTION

11. This Court has subject matter jurisdiction due to diversity of citizenship and amounts in controversy in excess of \$75,000.00, exclusive of interest and costs, pursuant to 28 U.S.C. Section 1332.

12. Venue is proper in this district pursuant to 28 U.S.C. Section 1391

13. A controversy exists between the parties as to statements made by JACK as an agent/representative/employee/independent contractor/officer for Defendants CNN and TURNER during his normal working hours in which both Defendants CNN and TURNER ratified, against all people of Chinese ancestry.

14. The Plaintiffs have no adequate remedy at law.

AS AND FOR A FIRST CAUSE OF ACTION

15. Plaintiffs repeats and realleges each and every allegation contained in the paragraphs of the complaint numbered 1 through 10 as if fully set forth at length herein.

16. On or about April 9, 2008, Defendants without support therefore, published oral defamatory remarks to third parties world-wide.

17. That Defendants without support therefore, in a CNN Situation Room charged the Chinese people, private citizens, with an assault by saying the following: "[t]hey're [Chinese] are basically the same bunch of goons and thugs they've been from the last 50 years." Further, he called all Chinese products "junks".

18. Above statements were repeatedly republished worldwide directly or indirectly by defendants or third parties.

19. That the statements written and published by Defendants were false, defamatory, malicious, slanderous and libelous.

20. Upon information and belief, at the time of the aforesaid publication, Defendants were motivated by actual malice in that Defendants knew the matters contained therein concerning Plaintiffs so published were false and untrue, or were published with reckless and wanton disregard of whether they were false and untrue.

21. Defendants acted in a grossly irresponsible and malicious manner by publishing said comments to third parties.

22. The statements published constitute slander per se and libel per se.

23. Plaintiffs, and the class they represent, enjoys and always has enjoyed an excellent reputation for hard work, honesty, integrity and competence in the world community in general and specifically.

24. In particular, plaintiffs are granted the opportunity to hold the 2008 Summer Olympic Game in the near future, to welcome athletes and honored guests, including statesmen and private citizens from world wide to their hometown for ceremony and celebration, for the first time in their 5000 years history.

25. As a result of the publications and acts of Defendants in connection thereinwith, Plaintiffs have been held to world public contempt, ridicule, disgrace and prejudice; has suffered great mental pain and anguish; and has been irreparably harmed in their good name and social standing, and has lost the esteem and respect of friends, acquaintances, and has lost business associates, business opportunities, and suffered irreparable damages in marketing their products in the world public generally.

26. Defendants knew or should have known that by publishing these statements, false and derogatory impression of Plaintiffs would be created in the minds of

the third parties, which would impugn and damage the reputation of Plaintiffs with colleagues, peers , business world and with the world community in general.

27. That by reason of the foregoing, Plaintiffs have suffered damages in the amount set forth below.

28. The amount of damages sought in this action exceeds the jurisdictional limit of all lower courts that would otherwise have jurisdiction.

AS AND FOR A SECOND CAUSE OF ACTION

29. Plaintiffs repeats and realleges each and every allegation contained in the paragraphs of the complaint numbered 1 through 27 as if fully set forth at length herein.

30. Defendants have intentionally published these statements, causing the said false and derogatory statements being repeated and broadcast world wide repeatedly, have refused to withdraw the false statement upon due demands, have refused to apologize for the intentional wrongful conduct as described.

31. As such, defendants have intentionally caused extreme emotional distresses on plaintiffs. Plaintiffs and members of plaintiffs' class have suffered agony, physical illness, loss of sleep, elevated anxiety, and worsened existing illness.

32. Plaintiffs have organized public demonstrations, protests, incurred time and money in efforts to clear their good name.

33. The amount of damages sought in this action exceeds the jurisdictional limit of all lower courts which would otherwise have jurisdiction.

AS AND FOR A THIRD CAUSE OF ACTION

34. Plaintiffs repeats and realleges each and every allegation contained in the paragraphs of the complaint numbered 1 through 32 as if fully set forth at length herein.

35. Defendants conducts are wanton, reckless, malicious and grossly negligent in that defendants have completely ignore the truth of the matter, have failed to investigate and verify the truth of the matter before making the false and derogatory statements.

36. Defendants' wrongful conducts occurred at a time that plaintiffs are granted the opportunity to hold the 2008 Summer Olympic Game in the near future, to welcome athletes and honored guests, including statesmen and private citizens from world wide to their hometown for ceremony and celebration, for the first time in their 5000 years history.

37. Defendants have recklessly and grossly negligent published these statements, causing the said false and derogatory statements being repeated and broadcast world wide repeatedly, have refused to withdraw the false statement upon due demands, have refused to apologize for the intentional wrongful conduct as described.

38. As such, defendants have intentionally caused extreme emotional distresses on plaintiffs. Plaintiffs and members of plaintiffs' class have suffered agony, physical illness, loss of sleep, elevated anxiety, and worsened existing illness.

39. Plaintiffs have organized public demonstrations, protests, incurred time and money in efforts to clear their good name.

40. The amount of damages sought in this action exceeds the jurisdictional limit of all lower courts which would otherwise have jurisdiction.

AS AND FOR A FORTH CAUSE OF ACTION

41. Plaintiffs repeats and realleges each and every allegation contained in the paragraphs of the complaint numbered 1 through 40 as if fully set forth at length herein.

42. Due to the nature of defendant's wrongful conduct and the resulted damages on plaintiffs good name, plaintiffs do not have adequate remedy at law.

43. Plaintiffs respectfully request an order from the court to compel defendants to withdraw the false statements publicly and issue an apology to plaintiffs publicly.

WHEREFORE, Plaintiffs demands judgment as follows:

- a) In regards to Plaintiffs' First Cause of Action, awarding the sum of \$1,300,000,000.00;
- b) In regards to Plaintiffs' Second Cause of Action, awarding the sum of \$1,300,000,000.00;
- c) In regards to Plaintiffs' Third Cause of Action, awarding the sum of \$1,300,000,000.00;
- d) In regards to Plaintiffs' Forth Cause of Action, ordering defendants to withdraw the false statements publicly and issue an apology to plaintiffs publicly.
- e) Awarding costs and disbursements of this action;

- f) Awarding reasonable attorneys fees; and
- g) Awarding such other and further relief as this Court deems just, proper and equitable.

Dated: April 18, 2008
Flushing, New York

LAW OFFICE OF MING HAI, P.C.

BY: 

MING HAI, Esq.

36-09 Main Street, Suite 7B

Flushing, New York 11354

(718)-445-9111

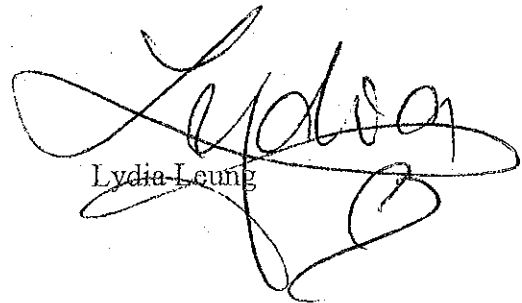
Attorney for Plaintiffs

VERIFICATION

STATE OF NEW YORK)
 ss.:
COUNTY OF QUEENS)

Lydia Leung, being duly sworn, deposes and says:

I am the Plaintiff in this Action, and I have read and know the contents of the foregoing Verified Complaint. The Verified Complaint is true to my own knowledge, except as to matters alleged upon information and belief, and as to those matters I believe it to be true.


Lydia Leung

Sworn to before me this 22nd Day APRIL, 2008



Notary Public

Don Chin
Notary Public, State of New York
No. 01CH4679325
Qualified in Queens County
Commission Expires

9/30/2010

VERIFICATION

Ming Hai , the undersigned attorney-at-law duly admitted to practice law in the State of New York and the U.S. District Court Southern District of New York, affirms the followings:

I am the attorney the law firm of Law Office of Ming Hai, PC, counsel for plaintiffs in this Action, and I have read and know the contents of the foregoing VERIFIED COMPLAINT. The VERIFIED COMPLAINT is true to my own knowledge, except as to matters alleged upon information and belief, and as to those matters I believe it to be true.

The sources of my information and grounds of my belief as to all matters in the foregoing document not stated to be made upon my knowledge are as follows: correspondence and other documents furnished by client or others, interviews and phone calls with parties and /or their employees , general investigation of the facts.

This verification is made by me because my client Lilan Li is located in a country different from the country and State where my office is.



Ming Hai